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IDAHO PUBLIC  
UTILITIES COMMISSION

**HAND DELIVERED**

June 22, 2011

Jean Jewell  
Secretary, Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID 83702

11-13

Re: Case No. PAC-E-~~13-11~~: CAPAI Petition to Intervene

Dear Ms. Jewell:

Included herewith is the original and seven (7) copies of Community Action Partnership Association of Idaho's Petition to Intervene in above-referenced proceeding. Thank you for your acceptance of this filing.

  
Brad M. Purdy

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bmpurdy@hotmail.com  
 Attorney for Petitioner  
 Community Action Partnership  
 Association of Idaho

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 IDAHO PUBLIC  
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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF )  
 ROCKY MOUNTAIN POWER SEEKING ) CASE NO. PAC-E-11-13  
 AUTHORIZATION TO SUSPEND FUTURE )  
 PROGRAM EVALUATIONS OF SCHEDULE 21, ) COMMUNITY ACTION  
 LOW INCOME WEATHERIZATION SERVICES ) PARTNERSHIP ASSOCIA-  
 FOR INCOME QUALIFYING CUSTOMERS ) TION OF IDAHO'S PETITION  
 ) TO INTERVENE  
 )  
 )

COMES NOW, Community Action Partnership Association of Idaho (hereinafter  
 "CAPAI" or "Intervenor") and, pursuant to Rules 071-075 of the Commission's Rules of  
 Practice and Procedure, IDAPA 31.01.01.071-075, hereby petitions the Commission for leave to  
 intervene in this proceeding and to appear and participate with full party's rights. In support of  
 this Petition, CAPAI states as follows:

1. The address and name of the Petitioner is:

Community Action Partnership Association of Idaho  
 5400 W. Franklin Rd., Suite G  
 Boise, ID. 83705

2. CAPAI will be represented in this proceeding by, and pleadings and other  
 correspondence need only be sent to:

Brad M. Purdy

Attorney at Law  
2019 N. 17<sup>th</sup> St.  
Boise, ID. 83702  
208-384-1299  
FAX: 208-384-8511  
Email: [bmpurdy@hotmail.com](mailto:bmpurdy@hotmail.com)

3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty include increasing utility rates for Rocky Mountain Power's low income rate payers.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. CAPAI is often the only party who intervenes in proceedings before the Commission specifically representing public utilities' low-income customers. In particular, CAPAI has been involved in the vast majority of PacifiCorp cases in recent years and works with the utility on a regular basis for many reasons such as implementation and auditing of the Company's low-income weatherization (LIWA) program and other matters.

Rocky Mountain Power's Application in this proceeding could clearly have a profound impact on the Company's LIWA program and the Company's low-income customers. Thus, the Application raises a variety of issues of importance to the general body of ratepayers and CAPAI has a direct and substantial interest in the subject matter of this proceeding. If granted intervention, CAPAI will fully address all aspects of the Company's Application. CAPAI's intervention in this case will not unduly broaden the issues presented by Rocky Mountain Power's Application.

4. CAPAI respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 21st day of June, 2011.



Brad M. Purdy

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the 21st day of June, 2011, I served a copy of the foregoing document on the following by U.S. mail, first class postage.

Ted Weston  
Rocky Mountain Power  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
[ted.weston@pacificorp.com](mailto:ted.weston@pacificorp.com)

Daniel E. Solander  
Rocky Mountain Power  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
[daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

DATED, this 21st day of June, 2011

  
Brad M. Purdy